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October 13, 2021

VIA ECF

The Honorable Nina Gershon
United States District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Suffolk County Water Authority v. The Dow Chemical Company, et al.*, 2:17-cv-06980-NG-RLM (main case)
South Farmingdale Water District v. The Dow Chemical Company, et al., 2:19-cv-1404-NG-RLM
New York American Water Company, Inc. v. The Dow Chemical Company, et al., 1:19-cv-2150-NG-RLM
Bethpage Water District v. The Dow Chemical Company, et al., 2:19-cv-1348-NG-RLM

Dear Judge Gershon:

We represent Third-Party Defendant Northrop Grumman Corporation (“Northrop Grumman”) in the above-referenced consolidated actions. We write in response to the First-Party Plaintiffs’ application to sever and stay third-party contribution claims that have been asserted against Northrop Grumman and numerous other Third-Party Defendants in these actions.

Northrop Grumman does not object to the above-noted motion, and understands that the rights of Northrop Grumman (and other Third-Party Defendants) would be preserved during that stay, including with regard to prior rulings or the scope of discovery they could pursue once the stay is lifted.

Respectfully,

/s/Mark A. Chertok
Mark A. Chertok
Elizabeth Knauer
*Attorneys for Third-Party Defendant
Northrop Grumman Corporation*